

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

IN RE:

RICE TIMBER SOLUTIONS, L.L.C.,

**CHAPTER 7 BANKRUPTCY
CASE NO. 20-60947**

Debtor(s)

**JOHN P. FITZGERALD, III,
Acting United States Trustee For Region Four,
Plaintiff,**

ADV. PROC. # 22-06009

v.

REGINALD R. YANCEY,

Defendant

**RESPONSE TO AMENDED COMPLAINT SEEKING RETURN OF FEES AND
SANCTIONS**

Comes now Respondent, Reginald R. Yancey, Attorney, concerning this Complaint, and states as follows:

1. Defendant admits all the allegations contained in paragraph(s) number 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 16, 17, 18, 21, 22, 28, 30, 31, 33, 34, 44, 45, 47, 48, 49, 50, 51, 52, 60, 69, 70, 78, 79, 83, and 110, of the said Complaint.
2. Defendant denies the allegations in paragraph numbers 19, 23, 37, 38, 56, 59, 64, 71, 75, 76, 87, 90, 95, 103, 107, 109 and 111 of the said Complaint.
3. Defendant neither admits nor denies the allegations in paragraph numbers 12, 13, 14, 15, 20, 24, 25, 26, 27, 29, 32, 35, 36, 39, 40, 41, 43, 46, 53, 54, 55, 57, 58, 61, 62, 63, 65, 66, 67, 68, 72, 73, 74, 77, 80, 81, 82, 84, 85, 86, 88, 89, 91, 92, 93, 94, 96, 97, 98, 99, 100, 101, 102, 104, 105, 106 and 108, but strict proof thereof is demanded.
4. As far as allegation number 42, the Defendant denies that Ryland B. Rice gave him \$25,000.00 in cash.

WHEREFORE, the Defendant, Reginald R. Yancey, Attorney, prays that the Complaint be dismissed and for such other relief as to equity seems meet.

Date: May 25, 2022

By: /s/ RR Yancey
Reginald R. Yancey

Reginald R. Yancey
Defendant
V.S.B. # 17958
1933 Fort Avenue, Lynchburg, VA 24501
P.O. Box 11908, Lynchburg, VA 24506
(434) 528-1632, Fax (434) 846-7122
Email : rryald@comcast.net

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Defendant

NOTICE OF HEARING

PLEASE TAKE NOTICE that the Court has fixed the date of Thursday, July 20, 2022, at 10:00 A.M., in the U.S. Bankruptcy Court, Video Conference using Zoom, on the Defendant's Response to Amended Complaint Seeking Return of Fees and Sanctions.

You are invited to represent your interests therein.

Date: May 25, 2022

R. R. Yancey

By: /s/ RR Yancey

Reginald R. Yancey, V.S.B. 17958
Defendant
1933 Fort Avenue, Lynchburg, VA 24501
P.O. Box 11908, Lynchburg, VA 24506
Lynchburg, VA 24501
(434) 528-1632, fax (434) 846-7112

CERTIFICATION

I, the undersigned, hereby certify that a true copy of this foregoing Response to Amended Complaint Seeking Return of Fees and Sanctions and Notice of Hearing was sent by the ECF System and by U.S. First Class Mail, postage prepaid, to United States Trustee's Office, Attn: W. Joel Charboneau, Trial Attorney, Suite 505, 210 First Street, Roanoke, VA 24011, on this 25th day of May 2022.

/s/ RR Yancey

Reginald R. Yancey